

ENVIRONMENTAL PROTECTION AGENCY REGION 1
PRELIMINARY ASSESSMENT DECISION RECORD FY 87

I. IDENTIFICATION	
01 STATE	02 SITE NUMBER
CT	981898422

II. SITE NAME AND LOCATION	
01 SITE NAME (Legal, common, or descriptive name of site)	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER
Hubbard-Hall Chemical, Inc.	563 South Leonard ST
03 CITY	04 STATE 05 ZIP CODE
Waterbury	CT 06720

DRAFT PA: completed by ☒ FIT (F1-8701-17)
☐ State
☐ EPA
☐ _____

REVIEWED ☐ Site Name
☐ Site ID No.
☐ Existing File
BY _____

DRAFT PRIORITY ASSESSMENT/RECOMMENDATION FOR SITE INSPECTION
0 High 0 Medium ☒ Low 0 None

SUMMARY OF COMMENTS ON DRAFT

a. STATE comments, dated _____, by _____

Summary _____

b. SITE OWNER comments, dated _____, by _____

Summary _____

c. EPA REGION 1 comments, dated _____, by _____

Summary _____

d. _____ comments, dated _____, by _____

Summary _____

FINAL PA DECISION BY EPA PA COORDINATOR:

- a. ☒ agree with draft.
b. ☐ Revised draft. Reason _____

c. Final Priority Assessment/Recommendation for Site Inspection

0 High 0 Medium ☒ Low 0 None

d. Final decision made by MJ. Katsimiri Date 3 Aug 1987

CERCLIS INFORMATION:

- a. Site Discovery Date _____ (If not already in CERCLIS)
b. PA Start Date 1/1/87 ; Compl. Date 8/3/87 & FY 87 Quarter 1 2 3 4
c. Entry Date 8/13/87 ; Entered By 898B



19 CROSBY DRIVE
BEDFORD, MASSACHUSETTS 01730
(617) 275-2970

C-583-7-7-97
July 27, 1987

**Preliminary Assessment
Hubbard-Hall Chemical, Inc.
Waterbury, Connecticut**

**TDD No. F1-8701-17
Reference No. \$375CTC3PA
CERCLIS No. CTD981898422**

INTRODUCTION

The NUS Field Investigation Team (NUS/FIT) was requested by the Waste Management Division of the Region I U.S. Environmental Protection Agency (EPA) to perform a Preliminary Assessment (PA) of the Hubbard-Hall Chemical, Inc. facility located in Waterbury, Connecticut (Figures 1 and 2). This work was completed under Technical Directive Document (TDD) No. F1-8701-17 issued in January 1987.

The Preliminary Assessment prepared within complies with the requirements set forth under the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended. It does not necessarily fulfill the requirements of other EPA regulations, such as those under the Resource Conservation and Recovery Act (RCRA). The Preliminary Assessment is not intended to be a definitive study of the site and is therefore not suitable for use in planning site remediation or undertaking enforcement actions against potentially responsible parties. The PA represents the first step of the site screening process set forth by the National Contingency Plan (NCP).

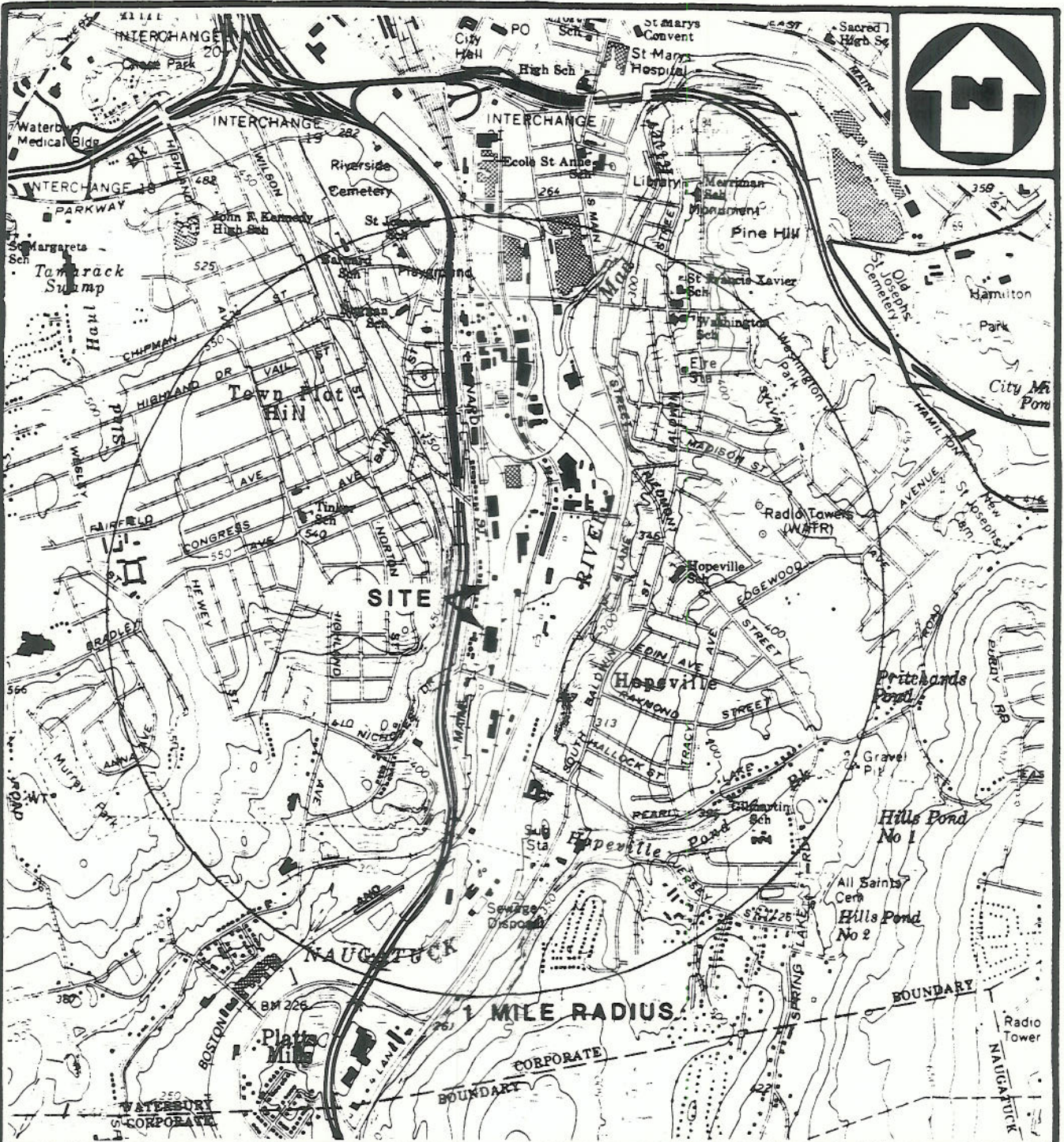
The Hubbard-Hall Chemical facility was recommended for a PA by the Connecticut Department of Environmental Protection (CT DEP) as a result of previous evidence of onsite spills of methylene chloride and 1,1,1-trichloroethane.

SITE DESCRIPTION AND HISTORY

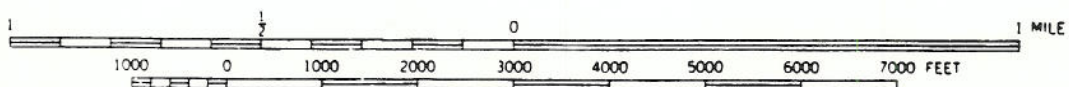
Hubbard-Hall Chemical is located at 563 South Leonard Street in Waterbury, Connecticut (Figure 1). The site consists of a main building, garage, and a farm division. A fence surrounds three quarters of the facility. During a perimeter survey conducted on January 16, 1987 by NUS/FIT, approximately twenty above ground storage tanks were observed in piles between the main building and the garage (Figure 2).

The facility, which is currently active, manufactures and distributes chemicals for metal finishing and cleaning. Cleaning and finishing chemicals manufactured and stored on the facility include acid salts, chlorinated solvents, flammable solvents, acids, and other compounds. The company has been operating at this site since 1968 and has 70 employees (CT DEP, 1984).

The RCRA status of Hubbard-Hall Chemical is as a generator and transporter of chemicals.



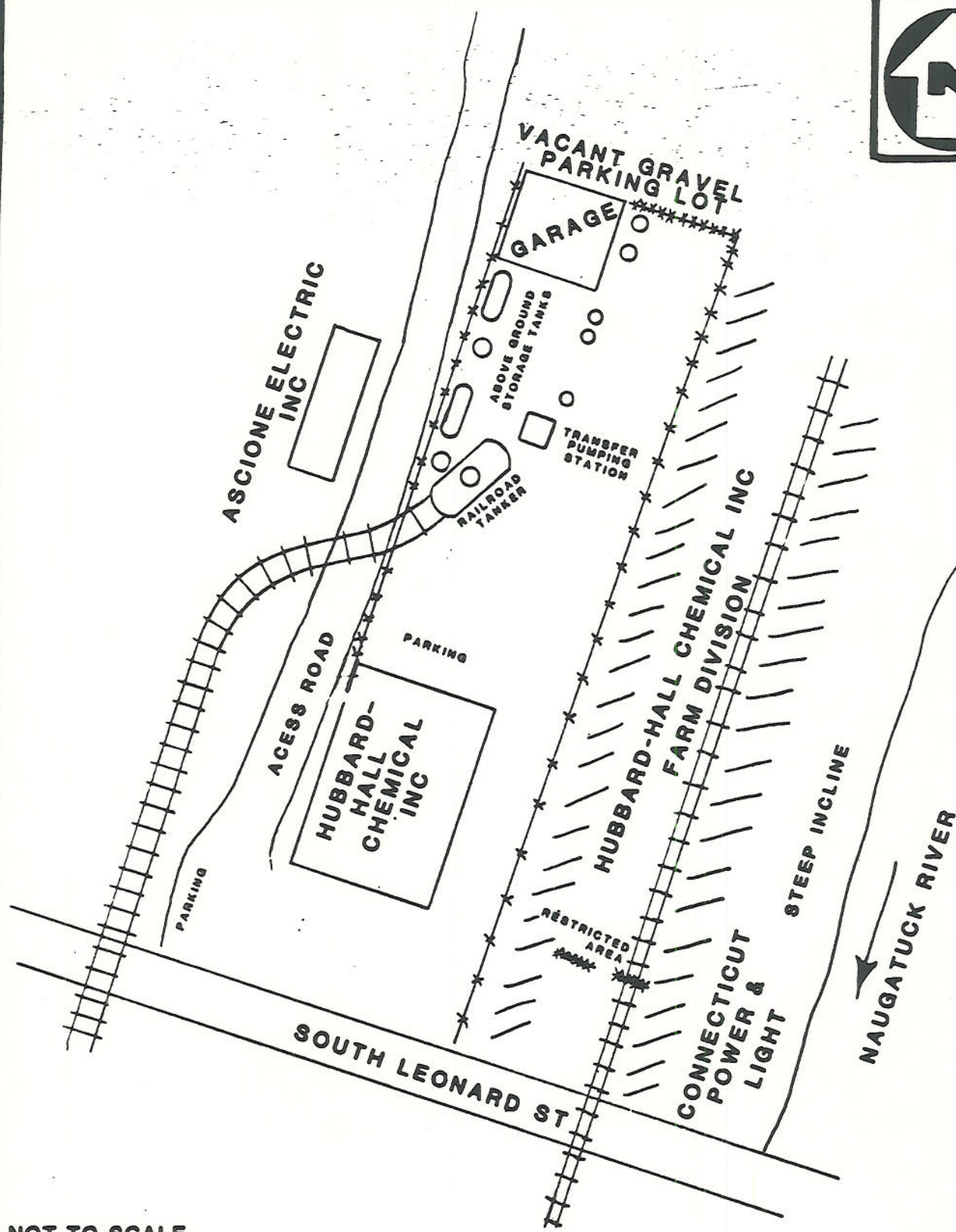
BASE MAP IS A PORTION OF THE FOLLOWING U.S.G.S. 7.5 SERIES QUADRANGLE(S) :
 WATERBURY, CT 1968, PHOTOREVISED 1984



LOCATION MAP
HUBBARD-HALL CHEMICAL INC.
WATERBURY, CT



FIGURE 1



NOT TO SCALE

SITE SKETCH
HUBBARD-HALL CHEMICAL INC
WATERBURY , CT



FIGURE 2

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There have been numerous violations of state and federal hazardous waste regulations at Hubbard-Hall Chemical. On several occasions, CT DEP cited the company for RCRA violations including storing waste beyond the permitted time limit and transporting hazardous waste without a permit. The company is a transporter of hazardous waste; but as of 1984 was storing such waste for more than ten days without a permit and without complying with EPA storage regulations (40 CFR Part 264) (CT DEP, 1984). The CT DEP has been conducting continuous inspections of the company since 1984 (CT DEP, 1985). A problem detected during a 1985 inspection concerned the floor drains in the plating area where accidental discharge of chemicals (such as cyanide) to the sewer could have occurred. The CT DEP ordered Hubbard-Hall Chemical to redirect or seal up the floor drains to prevent waste discharges to the sewer. The company indicated that it had complied, but the CT DEP has not verified compliance with the order (Pimenta, 1987). In 1986, Environmental Waste Removal (EWR), which was contracted with the company, collected and analyzed liquid samples from drums stored in the building, but the results were unavailable to NUS/FIT (CT DEP, 1984) (Pimenta, 1987c).

In 1984, Hubbard-Hall Chemical notified the CT DEP of a methylene chloride and 1,1,1-trichloroethane spill on the facility. The excavation of 204 cubic yards of contaminated soil was approved by the CT DEP and performed by HRP Associates, Inc. (CT DEP, 1985). The soil removal was performed in accordance to CT DEP requirements.

ENVIRONMENTAL SETTING

Land use within 500 feet of Hubbard-Hall Chemical is primarily industrial. The nearest residence is located less than 100 feet to the northwest of the company. The rest of the area within one mile of the facility is primarily residential (USGS, 1968). The Naugatuck River is approximately 0.25 miles east of the company and is used primarily for recreation. Overburden at the Hubbard-Hall Chemical property consists of moderately permeable sand and gravel (Flint, 1978).

The municipal water supply for the town of Waterbury consists of two interconnected reservoir systems, comprised of three storage and two distribution reservoirs. The surface water reservoirs are located approximately seven miles north of the facility (Sternberg, 1984). This system services 99.8% of Waterbury's 103,800 residents (Smith, 1986). There are approximately 185 people within Waterbury who are served by private wells, but it is unknown how many private wells are within three miles of the company (CT DEP, 1981).

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CONCLUSIONS AND RECOMMENDATIONS

In 1984, spills of methylene chloride and 1,1,1-trichloroethane occurred at the facility. CT DEP supervised the removal of contaminated soil from the property (CT DEP, 1984). There have not been any other spills recorded since 1984. There are no municipal water supplies within three miles of the facility. However, potential receptors of contamination include the Naugatuck River located 0.25 miles east of the company, marshes located approximately one mile south of the company, and approximately 185 people within Waterbury who are served by private wells. NUS/FIT therefore recommends that a Site Inspection (SI) of low priority be performed of the facility. The inspection should include sampling of groundwater and soil on and in the vicinity of the site to detect the presence of contaminants and to evaluate the effectiveness of the contaminated soil removal.

Submitted By:


Lisa M. Pimenta
Project Manager

Approval: 
R. DiNitto
Regional Manager

LMP/mtb

REFERENCES

- CT DEP. 1984-1986. Letters of Deficiency and Waste Profile Documentation, CT DEP files, Hubbard-Hall Chemical facility.
- Flint, R. 1978. The Surficial Geology of the Naugatuck Quadrangle. State Geological and Natural History Survey of Connecticut. No. 35.
- Pimenta, L. (NUS/FIT). 1987a. Telecon with Rich Pease (CT DEP) RE: site history, February 11.
- Pimenta, L. (NUS/FIT). 1987b. Telecon with Peter Ploch (Hazardous Waste Unit of CT DEP) RE: floor drains, February 11.
- Pimenta, L. (NUS/FIT). 1987c. Telecon with Marge Hart (Environmental Manager of Hubbard-Hall Chemical) RE: liquid analysis results, February 18.
- Pimenta, L. (NUS/FIT). 1987d. Telecon with J. Rinaldi (HRP Associates, Inc.), Re: soil excavation, July 13.
- Smith, N. (NUS/FIT). 1986. "Preliminary Assessment of Ansonia Copper and Brass, Waterbury, Connecticut". September.
- Sternberg, H. 1984. Directory of Community Water Supplies in Connecticut, Connecticut Water-Use Information Program, Connecticut Department of Environmental Protection, Natural Resources Center.
- USGS. 1968. Waterbury Quadrangle, Connecticut. 7.5' Series (Topographic). Photorevised in 1987.



**POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT**

I. IDENTIFICATION

01 STATE **CT** 02 SITE NUMBER **D981898422**

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Hubbard-Hall Chemical, Inc.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 563 South Leonard Street			
03 CITY Waterbury	04 STATE CT	05 ZIP CODE 06720	06 COUNTY New Haven	07 COUNTY 009	08 CONG DIST
09 COORDINATES LATITUDE 41° 32' 00" N LONGITUDE 73° 02' 30" W					

10 DIRECTIONS TO SITE (Starting from nearest public road)

Take Route 84 to Interchange 19 South on State Route 8 onto South Leonard Street. Travel south about a quarter of a mile; the company is located on the left.

III. RESPONSIBLE PARTIES

01 OWNER (If known) Hubbard-Hall Chemical, Inc.		02 STREET (Business, mailing, residential) 563 South Leonard Street			
03 CITY Waterbury	04 STATE CT	05 ZIP CODE 06720	06 TELEPHONE NUMBER (203) 756-5521		
07 OPERATOR (If known and different from owner)		08 STREET (Business, mailing, residential)			
09 CITY		10 STATE	11 ZIP CODE	12 TELEPHONE NUMBER ()	
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL: _____ (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: _____ (Specify) <input type="checkbox"/> G. UNKNOWN					

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED: ____/____/____ MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 d) DATE RECEIVED: ____/____/____ MONTH DAY YEAR ☒ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 08 / 01 / 86 MONTH DAY YEAR <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____	
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION 1968 BEGINNING YEAR present ENDING YEAR <input type="checkbox"/> UNKNOWN	

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Spills of methylene chloride and 1,1,1-trichloroethane occurred at the facility in 1984. Contaminated soil removal was overseen by CT DEP.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

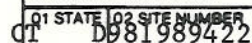
Potential receptors of contamination include the Naugatuck River located 0.25 miles east of the company and marshes located approximately one mile south of the company. The nearest residence is located less than 100 feet to the northwest of the company.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and Incidents)
☐ A. HIGH (Inspection required promptly) ☐ B. MEDIUM (Inspection required) ☒ C. LOW (Inspect on time available basis) ☐ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Marge Hart	02 OF (Agency, Organization) Hubbard-Hall Chemical, Inc.		03 TELEPHONE NUMBER 203 756-5521	
04 PERSON RESPONSIBLE FOR ASSESSMENT Lisa Pimenta	05 AGENCY NUS	06 ORGANIZATION FIT	07 TELEPHONE NUMBER 617 275-2970	08 DATE 07 / 27 / 87 MONTH DAY YEAR



☒ A. TOXIC ☐ E. SOLUBLE ☒ I. HIGHLY VOLATILE
☐ B. CORROSIVE ☐ F. INFECTIOUS ☐ J. EXPLOSIVE
☐ C. RADIOACTIVE ☐ G. FLAMMABLE ☐ K. REACTIVE
☐ D. PERSISTENT ☐ H. IGNITABLE ☐ L. INCOMPATIBLE
10% ☐ M. NOT APPLICABLE

EPA FORM 2070-12 (7-81)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT

PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE CT 02 SITE NUMBER D981898422

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☒ A. GROUNDWATER CONTAMINATION approx. 185 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION
Most of the town of Waterbury utilizes water derived from the municipal water supply, but approximately 185 persons rely upon groundwater for their drinking water supply. Any past release which may have occurred could threaten the quality of groundwater used as drinking water source.

01 ☒ B. SURFACE WATER CONTAMINATION 103,615 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION
Wastes from Hubbard-Hall Chemical have been disposed near the Naugatuck River, which is used for recreational purposes. No contamination is known for the municipal water supply. The population of Waterbury is 103,615.

01 ☐ C. CONTAMINATION OF AIR 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION
No information was available on air contamination.

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION
No information was available on any potential fire conditions at the site.

01 ☒ E. DIRECT CONTACT 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION
There is a fence that only surrounds three quarters of the site so direct contact with the waste is likely. Access is not restricted on the one quarter part of the property that is not fenced.

01 ☒ F. CONTAMINATION OF SOIL unknown 02 ☒ OBSERVED (DATE: Oct. 1984) ☐ POTENTIAL ☐ ALLEGED
03 AREA POTENTIALLY AFFECTED: _____ (Acres) 04 NARRATIVE DESCRIPTION
Methylene chloride and 1,1,1-trichloroethane were spilled onsite in 1984. Contaminated soil (204 cubic yards) was removed under the guidance of CT DEP.

01 ☒ G. DRINKING WATER CONTAMINATION approx. 185 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION
Methylene chloride and 1,1,1-trichloroethane were spilled onsite in 1984 and may have migrated to groundwater. Contaminated soil (204 cubic yards) was removed under the guidance of CT DEP.

01 ☒ H. WORKER EXPOSURE/INJURY 70 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 WORKERS POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION
If contaminated soil remains onsite, the 70 workers at the Hubbard-Hall Chemical could be affected.

01 ☒ I. POPULATION EXPOSURE/INJURY _____ 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
03 POPULATION POTENTIALLY AFFECTED: _____ 04 NARRATIVE DESCRIPTION
Access to the site is not restricted so direct contact with the waste is likely.



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE CT 02 SITE NUMBER D981898422

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

No information was available indicating any damage to flora.

01 ☐ K. DAMAGE TO FAUNA 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION (Include name(s) of species)

No information was available indicating any damage to fauna.

01 ☒ L. CONTAMINATION OF FOOD CHAIN 02 ☐ OBSERVED (DATE: _____) ☒ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

Potentially contaminated groundwater and surface water may discharge to the Naugatuck River, located 0.25 miles east of the facility. Fish and other members of the aquatic food chain could be affected.

01 ☒ M. UNSTABLE CONTAINMENT OF WASTES 02 ☒ OBSERVED (DATE: Oct. 1984) ☐ POTENTIAL ☐ ALLEGED
(Spills/runoff/standing liquids/leaking drums)

03 POPULA The CT DEP reported an onsite spill of methylene chloride and 1,1,1-trichloroethane in 1984. The CT DEP approved and oversaw the removal of 204 cubic yards of contaminated soil.

01 ☐ N. DAMAGE TO OFFSITE PROPERTY 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

No damage to offsite property was noticed during a January 1986 perimeter survey or indicated by CT DEP files.

01 ☒ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs 02 ☒ OBSERVED (DATE: 9-17-85) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

Following an inspection in 1985, CT DEP ordered that floor drains be sealed to prevent accidental release of chemicals to the sewer. CT DEP has not confirmed that the company has complied with the order.

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING 02 ☐ OBSERVED (DATE: _____) ☐ POTENTIAL ☐ ALLEGED
04 NARRATIVE DESCRIPTION

No information was available indicating that illegal or unauthorized dumping has occurred at the facility.

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

Hubbard-Hall Chemical has had a number of RCRA violations in the past. The CT DEP appears to be actively monitoring these RCRA concerns, however.

III. TOTAL POPULATION POTENTIALLY AFFECTED: approx. 185 the population served by private wells in Waterbury

IV. COMMENTS

Hubbard-Hall Chemical, Inc. is an active manufacturer, distributor, and transporter of chemicals, some of which may be hazardous. The chief CERCLA concern appears to be the reported spill of organic compounds to the ground in 1984. The CT DEP oversaw the removal of 204 cubic yards of contaminated soil in 1985.

V. SOURCES OF INFORMATION (Cite specific references, e. g., state files, sample analysis, reports)

1. Smith, N. (NUS/FIT) 1986. "Preliminary Assessment of Ansonia Copper and Brass, Waterbury, Connecticut". September.
2. Pimenta, L. (NUS/FIT) 1987. Telecon with Peter Ploch (Water Compliance Unit) February.

3. CT DEP. 1984-1986. Letters of Deficiency and Waste Profile Documents, CT DEP files, Hubbard-Hall Chemical facility.